

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

CHRISTOPHER DAUGHERTY

Criminal No. 2:22-cr-236

INFORMATION MEMORANDUM

AND NOW comes the United States of America, by its attorneys, Cindy K. Chung, United States Attorney for the Western District of Pennsylvania, and Brian W. Castello, Assistant United States Attorney for said District, and submits this Information Memorandum to the Court:

I. THE INFORMATION

A one-count information was filed against the above-named defendant for an alleged violation of federal law:

<u>Count</u>	<u>Offense</u>	<u>Title/Section</u>
One	Possession of a firearm and ammunition by a convicted felon On or about July 14, 2021	18 U.S.C. § 922(g)(1)

II. ELEMENTS OF THE OFFENSE

In order for the crime of Possession of a Firearm and Ammunition by a Convicted Felon, in violation of 18 U.S.C. § 922(g)(1), to be established, the Government must prove all of the following essential elements beyond a reasonable doubt:

1. The defendant knowingly possessed the firearm and/or ammunition described in Count One of the Information;
2. At the time of the charged act, the defendant had been convicted of a felony, that is, a crime punishable by imprisonment for a term exceeding one year;

3. At the time of the charged act, the defendant knew that he had been convicted of a felony, that is, a crime punishable by imprisonment for a term exceeding one year; and

4. The defendant's possession was in or affecting interstate or foreign commerce.

Third Circuit Model Jury Instruction 6.18.922G (modified).

III. PENALTIES

The maximum penalties for an individual convicted of Possession of a Firearm and Ammunition by a Convicted Felon (18 U.S.C. § 922(g)(1)) are as follows:

1. A term of imprisonment of not more than ten (10) years. However, if it is determined that the defendant has three (3) previous convictions for a violent felony or a serious drug offense, or both, then pursuant to 18 U.S.C. § 924(e), the term of imprisonment is not less than fifteen (15) years to a maximum of life imprisonment.

2. A fine of not more than \$250,000 (18 U.S.C. § 3571(b)(3)).

3. A term of supervised release of not more than three (3) years (or five (5) years if 18 U.S.C. § 924(e) applies) (18 U.S.C. § 3583).

4. Any or all of the above.

IV. MANDATORY SPECIAL ASSESSMENT

A mandatory special assessment of \$100.00 must be imposed at each count upon which the defendant is convicted (18 U.S.C. § 3013).

V. RESTITUTION

Restitution is not applicable in this case.

VI. FORFEITURE

As set forth in the Information, forfeiture may be applicable in this case.

Respectfully Submitted,

CINDY K. CHUNG
United States Attorney

/s/ Brian W. Castello

Brian W. Castello
Assistant U.S. Attorney
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